GUIDELINES FOR COMPLETING THE PA 161 APPLICATION, UNDERSTANDING PA 161 AND SUGGESTIONS TO CONSIDER BEFORE APPLYING FOR PA 161

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GUIDELINES FOR COMPLETING THE PA 161 APPLICATION

What is PA 161?

Public Acts of 2006 (Act No. 161) was approved by the 93rd Legislature to determine rules in which a dental hygiene may provide preventive dental hygiene services to underserved patients. The law, in particular, regulates the supervision requirements for a hygienist practicing under PA 161. Under PA 161 a "dental hygienist may perform dental hygiene services under the *supervision* of a dentist as part of a program for dentally underserved populations in this state conduced by a local, state, or federal grantee health agency for patients who are not "assigned by a dentist." In other words, the patient provided services by a PA 161 hygienist can not be a "patient of record" of a dentist.

Definitions:

- Patient of record: A patient who has been examined and diagnosed by a licensed dentist and whose treatment has been planned by a licensed dentist.
- Supervision: The overseeing of or participation in the work of any other individual by a health professional licensed under this article in circumstances in which 1 or more of the following exist:
 - The continuous availability of direct communication in person or by radio, telephone, or telecommunication between the supervised individual and a licensed health professional.
 - The availability of a licensed health professional on a regularly scheduled basis to review the practice of the supervised individual, to provide consultation to the supervised individual, to review records, and to further educate the supervised individual in the performance of the individual's functions.
 - The provision by the licensed supervising health professional of predetermined procedures and drug protocol.
- Assigned by a dentist: "Assignment" means that a dentist has designated a patient of record upon whom services are to be performed by an assistant, registered dental assistant or registered dental hygienist and has described the procedure to be performed. The dentist need not be physically present in the office or in the treatment room at the time the procedures are being performed.

Who can or must complete a PA 161 application?

Any hygienist performing preventive dental hygiene services without direct dental supervision in a school, nursing home, prison, community center, or other venue on underserved children must apply for and be approved for PA 161. Employment by a community public health dental clinic, Federally Qualified Health Center, prison or other entity serving the underserved *does not preclude* the requirement to obtain PA 161 status prior to services being performed.

Completing the PA 161 application:

The line number on the form corresponds to the instructions on how to complete the line. The application and instructions are organized into sections.

Section I General Information:

MICHIGAN DEPARTMENT OF COMMUNITY HEALTH PUBLIC HEALTH DENTAL DISEASE PREVENTION PROGRAM Request for Operation as Defined in MCL. 333.16625 (2005 PA 161)

| ¹ AGENCY/ENTITY | |
|--|--|
| ² CONTACT PERSON | |
| ³ ADDRESS | |
| | FAX NUMBER |
| City TELEPHONE NUMBER | Zip Code E-MAIL ADDRESS |
| ⁵ AGENCY/ENTITY DESIGNATION: ☐ Public ☐ College/University ☐ Nursing Care Facility ☐ Other: | ☐ Individual Registered Dental Hygienist |
| ⁶ NON-PROFIT TAX ID # | |

Section I General Information Instructions:

¹AGENCY/ENTITY: This is the formal title of the agency. An entity is a local, state, or federal health agency that cares for patients who are unassigned to a dentist. The agency or entity *must have a non-profit Tax ID number*.

• Who can apply for PA 161?

- o A public or non-profit "entity" or a school or nursing home that administers a program of dental care to a dentally underserved population.
- o Definitions: *Public or non-profit "entity":* Entities that provides public health services such as a Federally Qualified Health Center or a Local Health Department are good examples of a public or non-profit entity. Hygienists or foundations that have a Non-Profit Tax ID number are considered entities eligible for PA 161.

• Who is not eligible to apply for PA 161?

- A for-profit agency is not eligible for PA 161. However, a for-profit agency that utilizes a non-profit foundation arm or component to provide dental prevention services for the underserved population is eligible for consideration for PA 161 status. Documentation must be included in the application to ensure MDCH that PA 161 hygienists will only provide services to the underserved under the non-profit arm of the agency and that no profit will be made by serving these children above recuperation of expenses. For example, if a classroom of 30 children is scheduled for services, the PA 161 hygienist can only provide services to those children who are Medicaid, uninsured or are not required to pay any additional fees.
- o In circumstances that a dentist has completed an examination and described the procedures to be performed or completed a treatment plan, a PA 161 is not eligible to provide treatment on these patients. The patients are now considered "patients of record". PA 161 does not apply to "assigned" or "patients of record". In this circumstance, the hygienist would be required to perform services outlined in the

Administrative Rules of the Michigan Board of Dentistry *General* and *Direct Supervision*. A link to the Administrative Rules is: http://www.state.mi.us/orr/emi/admincode.asp?AdminCode=Single&Admin_Num= 33811101&Dpt=CH&RngHigh=

⁴TELEPHONE NUMBER. FAX NUMBER and E-MAIL ADDRESS: The correct phone number, FAX number and e-mail address should be listed on the application. Please be certain the e-mail address is legible. The MDCH Oral Health Program should be notified within 30 days of any change in telephone number, FAX or e-mail address information.

⁵AGENCY/ENTITY DESIGNATION: Check the box that most closely identifies the parent organization or setting for the PA 161 program. If more than one box applies, check all relevant boxes and describe the circumstance under "other".

⁶NON-PROFIT TAX ID #: A non-profit tax ID number must be provided. To obtain a non-profit tax ID number refer to legal council and/or visit the websites listed below.

http://smallbusiness.findlaw.com/business-structures/non-profit www.irs.gov

| Supervising Dentist and Hygienist Name(s) and License Numbers (All supervising dentists and dental hygienists must hold current Michigan licenses) 7Dental Director Name (if applicable): | | | |
|---|-----------|--|--|
| ⁸ Supervising Dentist: | License # | | |
| Supervising Dentist: | License # | | |
| ⁹ R.D.H. Name: | License # | | |
| R.D.H. Name: | | | |
| R.D.H. Name: | License # | | |
| Attach a page, if necessary, if more space is needed for listing names and license numbers. | | | |
| ¹⁰ Check here if you are a R.D.H. not affiliated with a public health agency, FQHC, or college/university. | | | |
| 11 are required to notify to the Oral Health Program of any changes in staff listed on the PA 161 agreement within 30 days. | | | |

⁷Dental Director Name (if applicable): If the dental facility has a dental director, the name should be listed here. This space is for a dentist who oversees a clinical facility. The Dental Direct may or may not be the supervising dentist. Disregard this line if the dental clinic or other entity does not have a Dental Director.

²CONTACT PERSON: The name of the person who can answer questions about the PA 161 application should be listed on this line. The PA 161 application, if approved, will be sent to this person.

³ADDRESS: The best address for correspondence should be listed here. The MDCH Oral Health Program should be notified within 30 days of any change in address. Although not guaranteed, every attempt will be taken to provide correspondence within 2 months of the expiration of a PA 161 application. Having a correct address and contact person will assist in the expiration notification process.

⁸Supervising Dentist: List the supervising dentist's name on this line along with the dentist's license number. The dentist must hold a current Michigan Dental License.

⁹R.D.H. Name: List the dental hygienist's name that will practicing under the PA 161 legislation. The dental hygienist must hold a current Michigan Dental Hygiene License. If additional space is needed, an addendum page can be added.

¹⁰Check this box if you are a dental hygienist starting a PA 161 independently of a public health agency, FQHC or school or university. Checking the box does not affect your application, the information is utilized only for data purposed.

¹¹You are required to notify to the Oral Health Program of any changes in staff listed on the original agreement within 30 days.

Section III Supervision Circumstance:

| ¹² Supervision circumstance: You must satisfy 1 or more of the following: | | |
|--|--|--|
| | Continuous availability of direct communication in person or by radio, telephone, or telecommunication between the supervised individual and a licensed dentist. | |
| | The availability of a licensed dentist on a regularly scheduled basis to review the practice of the supervised individual, to provide consultation to the supervised individual, to review records, and to further educate the supervised individual in the performance of the individual's functions. | |
| | The provision by the licensed supervising health professional of predetermined procedures and drug protocol. | |

Section III Supervision Circumstance Instructions:

¹²The applicant must select at least 1 of the listed supervision circumstance. The applicant may select more than 1 method of supervision. The method of supervision must be clearly defined in the required written documents accompanying the application.

Section III Program Overview:

| Program Overview: | NEW PROGRAM □ ¹³ | RENEWAL \square^{14} | |
|--|---|--|---------|
| ¹³ NEW PROGRAM – Check previously. | this box if you, your organization | on or your clinical facility have not been a PA 161 pr | rovider |
| ¹⁴ RENEWAL- Check this bostatus. | ox if you or your organization or | your clinical facility have been previously awarded I | PA 161 |
| ☐ ¹⁵ Public Health Agend ☐ ¹⁶ Early Head Start | cy \square ²⁰ Nursing \square ²¹ Head S | d reduced lunch and students treated do not have an | |
| 18 Migrant Farm Work | ters \Box 23 Prison | | |

| Describe the clinical setting in which the service is to be provided: (Check all boxes that apply) 24Public Health Clinic | |
|---|----------|
| Services to be Provided: (check all that apply) (Check all boxes that apply) 30 Diagnostic Screening | n |
| Section IV Program Overview Instruction: | |
| Underserved Population: 15 Public Health Agency – Check this box if the clinical facility is a local public health department, Federally Qualified Health Center, or public educational facility | |
| ¹⁶ Early Head Start – Check this box if the population to be served is Early Head Start (Ages 0-2) | |
| ¹⁷ School has >25% of students participating in a free and reduced lunch program and students treated do not have "assigned" dentist – Check this box if the school that a PA 161 hygienist provides services in has a minimum of 25% of the children in a free or reduced lunch program and the children are not "assigned" by a dentist. Beginnir on 1/1/2008 , a list of schools that PA 161 hygienists are utilized must be provided upon request to the MDC Oral Health Program to ensure compliance with this rule. The school list must be kept updated within 30 d of a change from the original document. The following website lists Michigan schools and their Free and Reduced Lunch participation rate: http://www.michigan.gov/cepi/0,1607,7-113-21423_30451_36965,00.html | ng CH |
| ¹⁸ Migrant Farm Workers- Check this box if the population to be served is migrant farm workers and their families | |
| ¹⁹ Other (please explain) | |
| ²⁰ Nursing home residents that do not have a dentist of record – Check this box if the population to be served is a nursing home or extended living facility. Clients seen must not be "assigned" by a dentist | |
| ²¹ Head Start - Check this box if the population to be served is Head Start (Ages 3-4) | |
| ²² Native American Reservation – Check this box if the population to be served is located on a Native American reservation | |
| ²³ Prison - Check this box if the clinical facility is a prison | |
| Clinical Setting: ²⁴ Public Health Clinic - Check this box if the clinical facility is a local public health department, Federally Qualified Health Center, or public educational facility | |
| ²⁵ Nursing Facility Setting- Check this box if the population to be served is a nursing home or extended living facility. Note: If a patient resides in a nursing care facility, a physicians order for dental services is required for Medicaid beneficiaries. The order cannot be a standing order. | ty. |
| ²⁶ School-based/school-linked program (note #17 above). | |
| ²⁷ Other: Please describe: | |

²⁸Public Health Mobile Clinic – Check this box if the setting is a mobile dental facility operated by a local public health department, educational institution or Federally Qualified Health Center

²⁹Mobile Dental Clinic- Check this box if the setting is a mobile dental facility not operated or facilitated by a local public health department or Federally Qualified Health Center

| Services | |
|------------------------|--|
| 30 Diagnos | tic Screening |
| F | Radiographs |
| C | Other Services: |
| ³¹ Preventi | ve – If these services are anticipated to be performed, they should be checked |
| | Prophylaxis |
| | Oral Health Education |
| F | Fluoride Varnish |
| Т | Opical Fluoride |
|] | Pit and Fissure Sealant |
| (| Other |
| | |

Section V Written Documents

| Written Documents Required: |
|--|
| Protocols: All of the following must be submitted with the PA 161 application: |
| □ ³² Patient Registration/Application Form |
| □ ³³ Health History Review Form |
| □ ³⁴ HIPAA Privacy Notice |
| □ ³⁵ Infection Control Procedures |
| ☐ ³⁶ Referral Procedures |
| □ ³⁷ Supervision Protocol (Contract or statement of supervision must be signed and dated by the supervising |
| dentist(s) and PA 161 hygienist(s) |
| ☐ ³⁸ Parent Permission Slip (if services performed are on children) |
| ³⁹ If sealants are performed, provide the evaluation measures that will be taken to ensure long-term retention of |
| the sealants |
| |
| |

Section V Written Documents Instructions:

All written documents listed above must be included with the PA 161 application.

³²Patient Registration/Application Form

• A standard registration or application form utilized in a dental office for services is acceptable.

³³Health History Review Form

• The health history should be comprehensive and appropriate for the clientele to be seen. For example, a medical history form for a clientele in a nursing home setting would be expected to be more comprehensive than a medical history form for a child in Early Head Start.

³⁴HIPAA Privacy Notice

• A standard HIPAA Privacy Form for clients to complete is acceptable.

³⁵Infection Control Procedures

- A good resource in developing infection control procedures is the Centers for Disease Control website: http://www.cdc.gov/OralHealth/infectioncontrol/
- The infection control procedures should be comprehensive and well-defined. CDC does recommend that instruments that will need to be transported from the area of use to a secondary location for sterilization, be cleaned in an ultrasonic and bagged prior to transporting the instruments (example: transporting instruments from a school site to the dental clinic for sterilization).

³⁶Referral Procedures

- The ultimate goal should be to establish a "dental home" for each client. A "dental home" is considered to be a dental provider who can provide a comprehensive examination and meet the restorative needs of the patient. All efforts should be made to find a dentist or dental clinic that can provide the necessary comprehensive dental examination and restoration.
- The application should not just list local dentists or public health dental clinics in the area, but should local dentists or dental clinics that have agreed to accept the clients seen by the PA 161 hygienist. Letters or statements of dentists agreeing to be referral sites should be included with the application.

³⁷Supervision Protocol

• This document should describe the supervision protocol that will be followed. The document should be detailed. A contract or statement of supervision must be signed and dated by the supervising dentist(s) and PA 161 hygienist(s).

³⁸Parent Permission Slip

• This document is needed if the PA 161 provides services on children

³⁹Sealant Evaluation

• If sealants are performed, the evaluation measures that will be taken to ensure long-term retention of the sealants must be documented.

Section VI Notes:

| Please | Note: Please initial the box next to the statement denoting that the statement has been read. |
|---------------|--|
| | ⁴⁰ Dental professionals are encouraged to have current continuing education in geriatrics (for nursing facility |
| | settings) and behavioral management and sealant placement courses for school settings. |
| | ⁴¹ A hygienist can only administer anesthesia and nitrous oxide analgesia or perform soft tissue curettage |
| | under the direct supervision of a dentist. |
| | ⁴² PA 161 will be monitored for Quality Assurance. The Oral Health Program may conduct record audits, |
| | review treatment records and request other quality assurance data such as sealant retention data. |
| | ⁴³ The Agency/Entity, Public Health Agency or Individual R.D.H. is responsible for notifying the MI Oral |
| | Health Program of any information changes within 30 days of the change. PA 161 must be renewed every 2 |
| | years. |
| | ⁴⁴ If a patient resides in a nursing care facility, a physicians order for dental services is required for Medicaid |
| | beneficiaries. The order cannot be a standing order. |

Section VI Notes Instructions:

The supervising dentist and hygienist(s) should read and initial each box.

• ⁴⁰A hygienist working in a nursing home should have sufficient experience to work with medically compromised patients. Working with the community to provide equipment and resources for the dental community should be a consideration. A referral network should be in place that can provide the necessary dental treatment needed. Professionals are encouraged to have current continuing education in geriatrics (for nursing facility settings) and behavioral management and sealant placement courses for school settings. An

- annotated list of websites related to geriatric education refer to the Michigan Oral Health Coalition website at http://www.mohc.org
- ⁴¹A hygienist can only administer anesthesia and nitrous oxide analgesia or perform soft tissue curettage under the direct supervision of a dentist.
- ⁴²PA 161 will be monitored for Quality Assurance. The Oral Health Program may conduct record audits, review treatment records and request other quality assurance data such as sealant retention data. The MDCH Oral Health program may conduct audits, review treatment records and request other quality assurance data such as sealant retention data. The PA 161 dental hygienist should keep careful records on patients treated and services provided to be prepared for a quality assurance review.
- 43The Agency/Entity, Public Health Agency or individual R.D.H. is responsible for notifying the MI Oral Health Program of any information changes within 30 days of the change. PA 161 must be renewed every 2 years.
- ⁴⁴If a patient resides in a nursing care facility, a physicians order for dental services is required for Medicaid beneficiaries. The order cannot be a standing order.

Section VII Signature Block:

| 45 | | |
|--|--|----------------------------|
| Signature of Dental Director (If applicable) | Printed Name of Dental Director | Date: |
| 46 | | |
| Printed Name of Supervising Dentist | Printed Name of Supervising Dentist | Date |
| 47 | | |
| Signature of Hygienist | Printed Name of Dental Hygienist | Date |
| 48 | | |
| Signature of Hygienist | Printed Name of Dental Hygienist | Date |
| ⁴⁶ The supervising dentist MUST sign this section which the supervising dentist MUST sign this section with the supervision with the superv | under this agreement must sign and date this | form. If additional space |
| PLEASE SEND COMPLETED FORM AND A Community Health, Division of Family & Com W. Michigan, 4 th Floor, Lansing, MI 48913. Fo 517-335-8697, semlers@michigan.gov. | munity Health, Oral Health Program, Washir | igton Square Building, 109 |
| ⁴⁹ Approved Not Approved Ja | net Olszewski, Director | Date |
| Please note that it may take 2-6 weeks for the P | A 161 process to be approved. | |

The Department of Community Health is an equal opportunity employer, services, and programs provider.

Points to consider before applying for PA 161 as a hygienist:

- The Michigan Dental Practice does not allow the PA 161 to work with a dental assistant or a "second pair of hands". A dental assistant must be directly supervised by a dentist. A dental assistant or other person may aid the hygienist in paperwork, coordination of patients, or other duties except the provision of direct preventive dental care services.
- A hygienist cannot bill Delta Dental, Medicaid or any other insurance company within Michigan. It is expected that a hygienist may be able to bill Medicaid by October, 2009. The dentist or contract entity must bill Medicaid or insurance and reimburse the hygienist for services rendered.
- Two specific articles have been written regarding the time necessary to "break even" with the investment in a dental practice, or in this case, a PA 161 operation. Statistics state that it takes up to 7 years to be at a point where a hygienist can equal what he/she would make should he/she continued in private practice. Variables such as whether the hygienist is employed by a public health agency or Federally Qualified Health Center (FQHC) or whether the hygienist has his/her own PA 161 practice, will depend on the profitability of the venture.
 - Reference: Journal of Public Health Dentistry, December 2007.
- Changes in PA 161 information: Minor changes such as adding or editing a dentist's or hygienist's name do not require a new application. The changes can be submitted to the MDCH/Oral Health Program. Major changes, such as a change in the contract between the dentist and hygienist or a new dentist assumes the supervision of the hygienist, require adequate documentation. For example, a new signed contract would be required to be submitted if the supervision of the dental hygienist was changed. Call the MDCH/Oral Health Program for specific information on documentation required.
- The PA 161 hygienist should be very familiar with the Dental Treatment Codes, billing Medicaid and other insurances, information regarding being a Medicaid provider, the Medicaid Provider Manual, the Medicaid fee reimbursement schedule, and Medicaid provider training. Some helpful websites are:
 - o Medicaid provider information: http://www.michigan.gov/mdch/0,1607,7-132-2945 5100---,00.html
 - o Medicaid codes and fee schedule: http://www.michigan.gov/mdch/0,1607,7-132-2945_5100---,00.html
 - o Examples:
 - Scaling and root planning is not a covered service of Medicaid
 - A hygienist can "assess" a tooth for a dental sealant and place a dental. sealant under PA 161. An exam by a dentist or radiographs is not necessary.
 - A screening assessment Medicaid code for children requires parent education.
 - Teledentistry (sending radiographs electronically to a dentist off-site for examination via computer technology) is not allowed.
- Online Application Trainings for MIChild, Healthy Kids, Plan First! And MOMS
 In order to be able to assist individuals in the online application process, agencies are
 encouraged to participate in a training session. All training sessions are conducted via
 conference call. Once at least one person from each location participates in a training
 session, that agency becomes a certified agency. When an applicant applies from a
 certified agency and qualifies for Healthy Kids or MOMS they are eligible for presumptive

- eligibility or up to 2 months of coverage. The training sessions information can be obtained through an e-mail to: taraclark@maximus.com
- A retired dentist who has a "volunteer" license cannot receive compensation for any services rendered. A PA 161 hygienist utilizing a volunteer dentist for supervision cannot expect compensation from Medicaid or other insurance through the volunteer dentist. For more information on the license requirements of a volunteer dentist and the application to apply for volunteer status, refer to: http://www.michigan.gov/documents/mdch/mdch_volunteer_app_pkt_179241_7.pdf
- A PA 161 hygienist should carry malpractice insurance.
- A PA 161 hygienist must be aware of the current laws to include a criminal background check to work in a nursing home and possibly a school.
- A PA 161 should be aware of the Family Educational Rights and Privacy Act (FERPA) when working with schools. FERPA is equivalent to HIPAA laws. For more information: http://www.ed.gov/policy/gen/guid/fpco/index.html
- Children receiving care under PA 161 are considered "at high risk" for dental disease. Socioeconomic status, as well as other indicators, place the child at high risk. The practitioner should consider the current literature regarding sealant placement and the provision of care to high risk children. Sealants should be placed whenever possible.
- The dentist or entity that will be billing for the services of the PA 161 hygienist must obtain a standard unique identifier for health providers through the National Plan and Provider Enumeration System (NPPES).
 - On the MDCH compliance date of October 1, 2007, the NPI will be the only health care provider identifier used for identification purposes in standard transactions by covered entities. Please refer to Policy Bulletin MSA 07-48 for all MDCH NPI Implementation guidelines.
 - The Administrative Simplification provisions of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) mandated the adoption of standard unique identifiers for health care providers and health plans. The purpose of these provisions is to improve the efficiency and effectiveness of the electronic transmission of health information. The Centers for Medicare & Medicaid Services (CMS) has developed the National Plan and Provider Enumeration System (NPPES) to assign these unique identifiers. If you are a Health Care Provider, the National Provider Identifier (NPI) is your standard unique identifier.
 - O NPI Websites:
 - http://www.michigan.gov/mdch/0,1607,7-132-2945-139313--,00.html
 - NPPES website: https://nppes.cms.hhs.gov/NPPES/Welcome.do
- Contracting or employment through a Federally Qualified Health Center (FQHC) or Local Public Health Agency (LPH) may be a more economical option for the PA 161 hygienist.:
 - Federally Qualified Health Centers (FQHC)s receive a special financial reimbursement rate plus Medicaid fee reimbursement. The additional funding may provide greater economic stability for the PA 161 hygienist. Services provided by the PA 161 hygienist will be reimbursed at a significantly higher rate than Medicaid reimbursement only.
 - Child and adolescent health centers (CAHC) or schools. Following the business model of mobile dental units, a PA 161 hygienist could contract with a school

district or districts to provide preventive services. If under contract, billing Medicaid for services rendered may be able to be completed through the school health clinic system. You may consider working with 3 or 4 schools that meet the poverty criteria and provide preventive oral health procedures to all the children. The CAHCs provide an excellent opportunity as the permission for services can be included in the health care permission forms, you can interact with medical staff, the children are in the school and do not require transportation, and the CAHC may be able to bill for you. While this concept is similar to mobile dental units, you could provide quality services, assist in follow-up and finding a dentist to see children in need and be an oral health resource for the contracted schools.

- You may be able to contract with several extended care facilities (nursing home) to provide regular prevention services.
- Working with an organized health agency such as a FQHC or LPH can be very advantageous for a hygienist. The reimbursement rates may be higher for the services performed, the billing system for procedures the dental hygienist will be performing is in place, a dentist may be available for supervision, and equipment and supplies may be supplied.
- Working with schools or nursing homes: Many schools or nursing homes may already have a contractual agreement for preventive services with a mobile clinic, FQHC or LPH. When determining the target population for services, the dental hygienist should contact the school system or nursing facility to determine if the services would be desired by the school. Refer to page 6 of this document for information regarding determination if the school meets the criteria for underserved. Nursing home residents must be verified that they are underserved and not a patient of record of a dentist.
- Several mobile dental units operate within Michigan schools. Some mobile dental units have a long history of working with schools. Extensive time must be spent in gaining permission to perform hygiene services in schools, discussing your program with school administrators, demonstrating why your PA 161 program should be utilized rather than a mobile unit, and determining if the school utilizes a mobile dental unit, etc.
- Data Collection, Record Keeping and Evaluation: The hygienist should have a system to collect data on the services provided, keep accurate patient records, and have a plan to evaluate the services performed. SEALS (Sealant Efficiency Assessment for Locals and States) is a free and excellent program for determining if a dental sealant program is successful. For more information on the SEALS data system contact: Michigan.gov/oralhealth or oralhealth@ Michigan.gov. To better position the hygienist for future grant opportunities, a good data collection, record keeping and evaluation plan will provide valuable information that can be used in writing the grant.
- A PA 161 hygienist should have a good command of expenses and time required to establish the program, a good knowledge of business principles, an extensive knowledge of Medicaid reimbursement fees, and a strong working knowledge of the Administrative Rules of the Michigan Board of Dentistry.
- As the statute and administrative rules are currently stated, an RDH clinical instructor providing dental preventive care in a clinical situation serving unassigned patients without a dentist present would have to hold the PA 161 designation to practice in that setting unless there is an established patient record for each child. Students are exempt from the provisions of the Public Health Code under 333.16171 (a) so if this program is operated

- through the auspices of an ADA accredited program, the instructor could supervise the students.
- PA 161 Approval Process: After submitting your application, it will be reviewed by the MDCH Oral Health Program. If the application is incomplete, the "contact person" listed on the application will be notified of any areas that are deficient. If the application meets all the requirements, the application will be submitted to the office of Director Janet Olszewski for approval. This process can take from 2 weeks to 6 weeks. Following approval, the name of the PA 161 entity, to include the hygienist and dentists listed on the application, will be submitted to the Michigan Board of Dentistry. Questions regarding the application may be referred to the PA 161 Advisory Committee. The PA 161 Advisory Committee is made up of a representative of the Michigan Dental Association, the Michigan Dental Hygiene Association, a Local Public Health Dental Clinic, Medicaid and MDCH.

Additional Resources:

MDCH Grants:

VARNISH! Michigan: The VARNISH! Michigan program provides annual grants, based on funding availability, to apply fluoride varnish to Early Head Start and Head Start children. For more information on this grant: Michigan.gov/oralhealth.

SMILE! Michigan: The SMILE! Michigan program provides two-year grants for the application of dental sealants for second grade and some sixth grade students in schools with a high percent of students enrolled in the Free and Reduced Lunch Program. For more information on this grant: Michigan.gov/oralhealth

Seal America – The manual contains information on developing, implementing and evaluating a dental sealant program.

- Getting started
- Gaining and maintain community support
- Staffing
- Purchasing equipment and supplies
- Funding
- Collecting and analyzing data
- Implementation of the program
- Referral and following up
- Evaluation

Contact the MDCH Oral Health Program: oralhealth@michigan.gov